UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

LUIS S. ARANA-SANTIAGO

CIVIL NO. 19-2128 (SCC)

Plaintiffs,

v.

Violation of Civil Rights

LUIS TAPIA-MALDONADO, et al.,

Defendants.

NOTICE OF APPEARANCE AND REQUEST OF EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW, Co-Defendants, Luis Tapia-Maldonado, Jose Heredia-Rodriguez, Marisol Diaz-Ocasio, in their personal capacities, without submitting to the jurisdiction of the Court and without waiving any right or defense arising from Title III of PROMESA and the Commonwealth's Petition under said Title or under this case, through the undersigned attorney and respectfully state and pray as follows:

- The Department of Justice has recently assigned the legal representation of the following codefendants, in their <u>personal capacities</u>, to the undersigned attorney: Luis Tapia-Maldonado, Jose Heredia-Rodriguez, Marisol Diaz-Ocasio (hereinafter co-defendants).
- 2. For the above stated reason, it is respectfully requested that this Honorable Court grant leave to appear on behalf of appearing co-defendants and that all future correspondence in the instant case, including all of this Honorable Court's Orders, be addressed also to the undersigned attorney.

3. Furthermore, the appearing co-defendants respectfully request a 30-day extension of time, until April 18, 2021, to evaluate the need to file a responsive pleading or motion

under Fed. R. Civ. P. 12 and to respond to Plaintiff's Motion for Sanctions.

4. The time extension herein requested is made in good faith and for good cause and it is not

intended to cause unnecessary delays in the proceedings held before this Court.

WHEREFORE, it is respectfully requested from this Honorable Court to allow our

appearance as attorney of record on behalf of the above-named co-defendants in this case and

that all future correspondence be addressed to the undersigned attorney, and appearing co-

defendants respectfully request a 30-day extension of time, until April 18, 2021, to file a

responsive pleading or motion under Fed. R. Civ. P. 12.

I HEREBY CERTIFY that I sent notification to the following mailing address: PO Box

500, Orocovis, PR 00720.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, March 19, 2021.

DOMINGO EMANUELLI HERNÁNDEZ

Designated Secretary of Justice

SUSANA PEÑAGARÍCANO-BROWN

Secretary in Charge of Litigation

IDZA DÍAZ RIVERA

Director of Legal Affairs

Federal Litigation and Bankruptcy Division

s/ Josué N. Torres Crespo

Josué N. Torres Crespo

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